

STEPHANIE M. HINDS (CABN 154284)
United States Attorney

THOMAS A. COLTHURST (CABN 99493)
Chief, Criminal Division

CHRISTA HALL (CABN 328881)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
FAX: (415) 436-7234
Christa.Hall@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. 3:22-CR-00210-SI
)	
Plaintiff,)	STIPULATION TO EXCLUDE TIME FROM
)	AUGUST 26, 2022 TO SEPTEMBER 9, 2022 AND
v.)	[PROPOSED] ORDER
)	
CHRISTOPHER WAGNER,)	
)	
Defendant.)	

It is hereby stipulated by and between counsel for the United States and counsel for the defendant Christopher Wagner, that time be excluded under the Speedy Trial Act from August 26, 2022 through September 9, 2022.

At the scheduled change of plea hearing on August 26, 2022, the government and counsel for the defendant agreed that time be excluded under the Speedy Trial Act so that defense counsel could continue to prepare, including by reviewing the discovery already produced. For this reason and as further stated on the record at the hearing, the parties stipulate and agree that excluding time until the change of plea hearing now scheduled for September 9, 2022, will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from August 26, 2022 through September 9, 2022 from

STIPULATION TO EXCLUDE TIME AND [PROPOSED] ORDER
Case No. CR-210-SI

1 computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a
2 speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

3 The undersigned Assistant United States Attorney certifies that she has obtained approval from
4 counsel for the defendant to file this stipulation and proposed order.

5
6 IT IS SO STIPULATED.

7 DATED:

/s/
CHRISTA HALL
Assistant United States Attorney

9
10 DATED:

/s/
DANIEL BLANK
Counsel for Defendant CHRISTOPHER WAGNER

11
12 **[PROPOSED] ORDER**

13 Based upon the facts set forth in the stipulation of the parties and the representations made to the
14 Court on August 26, 2022 and for good cause shown, the Court finds that failing to exclude the time
15 from August 26, 2022 through September 9, 2022 would unreasonably deny defense counsel and the
16 defendant the reasonable time necessary for effective preparation, taking into account the exercise of
17 due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by
18 excluding the time from August 26, 2022 to September 9, 2022 from computation under the Speedy
19 Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and
20 with the consent of the parties, IT IS HEREBY ORDERED that the time from August 26, 2022 through
21 September 9, 2022 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C.
22 § 3161(h)(7)(A), (B)(iv).

23 IT IS SO ORDERED.

24
25 DATED: _____

Hon. Susan Illston
United States Senior District Judge